

LAW OFFICES
HALEY BADER & POTTS P.L.C.

4350 NORTH FAIRFAX DR., SUITE 900

ARLINGTON, VIRGINIA 22203-1633

TELEPHONE (703) 841-0606

FAX (703) 841-2345

E-MAIL: haleybp@haleybp.com

JOHN WELLS KING
ADMITTED IN VA AND DC

OUR FILE NO.

0040-101-60

February 11, 1997

William F. Caton, Acting Secretary
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

Re: Newspaper/Broadcast Cross-Ownership
MM Docket No. 96-197

Dear Mr. Caton:

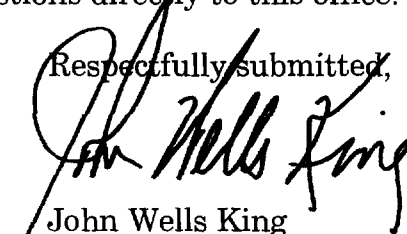
On behalf of Donrey Media Group I transmit herewith its comments for association with the above-referenced proceeding, consisting of the letter of its President and Chief Operating Officer, Emmett Jones.

These comments previously were timely filed with the Commission on February 7, 1997, by facsimile copy of Mr. Jones' letter.

The original is enclosed herewith.

Kindly communicate any questions directly to this office.

Respectfully submitted,



John Wells King

JWK/jb
Enclosure

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DONREY MEDIA GROUP

NEWSPAPER
OUTDOOR CABLE

EMMETT JONES
PRESIDENT
CHIEF OPERATING OFFICER

3600 WHEELER AVENUE
POST OFFICE BOX 17017
FORT SMITH, ARKANSAS 72917-7017
501-785-9473
FAX 501-785-9430

February 7, 1997

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, N.W.
Washington, DC 20554

**Re: In the matter of Newspaper/Radio - Cross-Ownership Waiver Policy
MM Docket 96-197**

**In the matter of Newspaper/TV - Cross-Ownership Waiver Policy
MM Docket 96-197**

Comment Date: 2/7/97

Dear Mr. Caton:

This letter is in reference to the Commission's request for comments on changes, if any, which should be made to the newspaper/broadcast cross-ownership waiver policy with respect to newspaper/radio and newspaper/TV cross-ownership restrictions.

DR Partners d/b/a Donrey Media Group ("Donrey") operates 47 daily newspapers in small to medium-sized cities in 17 states and also operates the *Las Vegas Review-Journal* in Las Vegas, Nevada. Additionally, the company operates eight outdoor advertising companies. In the past, before the adoption of the cross-ownership restrictions, Donrey owned and operated AM radio stations and TV stations in markets where it owned daily newspapers. All such stations have been sold. Donrey currently does not have any plans to re-enter radio broadcasting, but has explored this segment of the media market from time to time.

Donrey believes that, since the cross-ownership rules were adopted in 1975, the media landscape has expanded exponentially in the smaller communities in which it operates. Such communities now have full access to the Internet. The availability of local cable television advertising and programming services has dramatically changed the competition matrix. Each community has either a competing daily, weekly or shopper publication. "Niche" publications such as senior citizen magazines, parent magazines and the like have also proliferated in each of the communities in which Donrey operates. Since 1975, the Commission has also licensed LPTV stations in many Donrey communities. The number of radio stations licensed to each of the smaller communities in which Donrey operates has also increased dramatically. Many of these



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William F. Caton
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stations are not able to attract the advertising revenues necessary to operate profitably and would benefit from the operating synergies of a local newspaper.

We believe the newspaper/broadcast cross-ownership rules, whether for television or radio, are anachronistic, violative of the First Amendment, and place our company at a competitive economic disadvantage. They should be repealed in their entirety.

As an example, we call your attention to one particular market in which Donrey operates. Bartlesville, Oklahoma, is a town of approximately 34,000 people and is located 45 miles north of Tulsa, Oklahoma. Donrey publishes the *Bartlesville Examiner-Enterprise*, a 12,000 circulation, 6-day daily newspaper in the market. The Bartlesville market is served by 12 radio stations which place their principal community contours within the Bartlesville market. In addition, more than 20 Tulsa radio stations cover the Bartlesville market. The *Tulsa World*, a metropolitan newspaper, has a 25% market penetration in Bartlesville. Bartlesville is also served by the "Good News" and "Bargain Post", both shoppers. One of the Bartlesville stations, KRIG-FM, actually engages in the publishing business. KRIG publishes a shopper, "Coupon Express," which it distributes by mail and other means in the Bartlesville area. It touts its increased circulation over the *Bartlesville Examiner-Enterprise* (20,000 v. 12,000). On October 31, 1996, Coupon Express had more than 24 pages of advertising from Bartlesville and surrounding areas. It sells advertising in conjunction with its publishing enterprise and the radio station. KRIG is permitted to engage in the publishing business, while Donrey is not allowed to purchase and operate a local radio or TV station in the Bartlesville market.

We believe the Commission's radio and TV cross-ownership rules put the *Bartlesville Examiner-Enterprise* and similar Donrey newspapers at an unfair economic disadvantage, vis à vis, the local radio/TV stations which are allowed to publish and distribute print publications.

Sincerely,



Emmett Jones